

David W. Silke (OBN 914295)
Email: dsilke@grsm.com
Robert L Gillette, II (OBN 220903)
Email: rgillette@grsm.com
GORDON REES SCULLY MANSUKHANI, LLP
1300 SW Fifth Avenue, Suite 2000
Portland, OR 97201
Telephone: (206) 695-5112
Facsimile: (503) 616-3600

Thomas C. Koessl, *Pro Hac Vice*
E-Mail: tkoessl@lgcounsel.com
Ashleigh A. Stochel, *Pro Hac Vice*
E-mail: astochel@lgcounsel.com
L&G LAW GROUP, LLP
Chicago, Illinois 60610
Telephone: (312) 364-2500

Of Attorneys for Defendant Tomahawk Manufacturing

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

JAMES B. WOLFF,
Plaintiff,
v.
TOMAHAWK MANUFACTURING, a
Wisconsin corporation,
Defendant.

No. 3:21-cv-00880-SI

**DECLARATION OF ROBERT L.
GILLETTE II IN SUPPORT OF
DEFENDANT'S OPPOSITION TO
PLAINTIFF'S MOTION TO AMEND CASE
MANAGEMENT ORDER**

I, Robert L. Gillette II, declare as follows:

1. The parties to this matter are not engaged in discussions to resolve Plaintiff's request to file a Third Amended Complaint.

2. I have searched our file, and I am not aware of any outstanding discovery requests by either party.

3. I, nor any of my co-counsel, have recently conferred with Plaintiff's counsel regarding additional discovery.

4. Plaintiff's counsel has not requested any additional depositions.

I declare under penalty of perjury under the laws of the State of Oregon that the foregoing is true and correct.

Executed this 5th day of December 2022 at Seattle, WA.

s/ Robert L. Gillette, II

Robert L. Gillette, II, OBN 220903

CERTIFICATE OF SERVICE

I hereby certify that on this day, the foregoing document will be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all registered participants.

Morris J. Morris, OSB #772839

Aruna A. Masih, OSB #973241

mike@bennetthartman.com

aruna@bennetthartman.com

Attorneys for Plaintiff

Michael G. Jacobs, OSB #09392

mike@bennetthartman.com

Attorney for Defendant

Thomas C. Koessl, Pro Hac Vice

Asleigh A. Stochel, Pro Hac Vice

tkoessl@lgcounsel.com

astochel@lgcounsel.com

Admitted Pro Hac Vice Attorneys for Defendants

DATED: December 5, 2022.

s/ Christine F. Zea

Christine F. Zea, Legal Assistant